

1
2 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

3 -----X
4 Estate of VALERIE YOUNG, by VIOLA YOUNG,
5 as Administratrix of the Estate of
Valerie Young, and in her personal
6 capacity, SIDNEY YOUNG, and LORETTA
YOUNG LEE,

Plaintiffs,

7 vs.

Index No.:
07CV6241

8 STATE OF NEW YORK OFFICE OF MENTAL
9 RETARDATION AND DEVELOPMENTAL
DISABILITIES, PETER USCHAKOW,
10 personally and in his official
capacity, JAN WILLIAMSON, personally
11 and in her official capacity, SURESH
12 ARYA, personally and in his official
capacity, KATHLEEN FERDINAND,
13 personally and in her official
capacity, GLORIA HAYES, personally and
14 in her official capacity, DR. MILOS,
personally and in his official capacity,

Defendants.

15 -----X

16 April 8, 2008
17 9:59 a.m.

18 Examination before trial of SURESH
19 ARYA, held at the offices of The Catafago
20 Law Firm, P.C., 350 Fifth Avenue, New
21 York, New York, pursuant to Notice,
22 before Wendy D. Boskind, a Registered
23 Professional Reporter and Notary Public
24 of the State of New York.
25

1 Arya
2 need their help, so you take that
3 document to be billed.

4 Q. Do you know if there were
5 such documents involving Valerie?

6 A. She has to have Medicaid or
7 Medicare.

8 Q. Do you know if she had it?

9 A. Uh -- I cannot say what she
10 had, but yes, she had it.

11 Even if she did not have
12 regular, she would have emergency
13 Medicaid card, so that she will have
14 something.

15 MR. CATAFAGO: I'm going to
16 call for the production of that.
17 According to my notes, those
18 certifications were not produced.

19 (REQUEST.)

20 MR. VELEZ: Counsel, the full
21 medical file was produced. Maybe
22 you just need to make a second
23 look, because it's 10,000 pages.

24 MR. CATAFAGO: Yes, I have
25 10,000 pages, I'm telling you my

1 Arya

2 Q. Right.

3 A. -- there is the gray record,
4 there is blue, so different binders. It
5 may not be part of her medical records.
6 The medical record is completely
7 different.

8 MR. CATAFAGO: So we ask for
9 all records relating to her
10 treatment.

11 (REQUEST.)

12 MR. VELEZ: And all records
13 were produced.

14 Q. And this is not something
15 that's destroyed, right --

16 A. No.

17 Q. -- this is something
18 maintained?

19 A. It's currently kept. The old
20 ones are destroyed.

21 Q. How often are they destroyed?

22 A. Until the new one is placed,
23 then you don't need the old one.

24 Q. How --

25 A. It's ongoing current